

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

v.

**DEVOS LTD. d/b/a Guaranteed
Returns, et al.**

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CRIMINAL ACTION

NO. 14-574 (PBT)

DEFENDANTS' MOTION FOR RECONSIDERATION

For the reasons set forth in the accompanying Memorandum of Law, Defendants Devos Ltd. d/b/a Guaranteed Returns, Dean Volkes and Donna Fallon respectfully move this Court for an order as follows: granting reconsideration of the Court's order dated January 11, 2017 and, upon reconsideration, granting Defendants' motion to compel brought December 29, 2016, directing the Government to produce: (1) A list of the persons or entities to whom the Government has sent, or from whom the Government has received, information concerning their dealings with Devos a/k/a Guaranteed Returns, further to any website posting, mailings, or other communications by the Government with Guaranteed Returns' customers from in or about October 2016 to date, separated into two categories: (i) those persons or entities that responded to the Government's website posting, mailings, or other communications, and (ii) those that did not respond, and (2) A report of the number of viewers of each of the postings or links relating to

Guaranteed Returns at any website maintained by the Government in connection with such website posting, mailings, or other communications.

Dated: New York, New York
January 17, 2017

Respectfully Submitted,

SCHLAM STONE & DOLAN LLP

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